

Exhibit D

Defendants.

$$\begin{array}{ccccccc} & \vdots & \vdots & \vdots & \vdots & \vdots & \\ -\mathbf{x} & \vdots & \vdots & \vdots & \vdots & \vdots & \end{array}$$

Civil Action No. 14-cv-3042 (RMB) (AJP)

Although their investigation is ongoing, the VBG defendants have made a reasonable and good faith effort to satisfy the disclosure requirements of Rule 26(a)(1). These disclosures reflect the information and documents known and presently available to the VBG

defendants at this time after the exercise of reasonable diligence. The disclosures contained herein are made in a good faith effort to supply such factual information as is presently known, and do not limit or prejudice the VBG defendants' right to supplement this disclosure in relation to further pleading, discovery, review, research or analysis. The VBG defendants reserve the right to object to the use — in discovery proceedings, in trial or for any other purposes — of the information provided herewith based upon relevance, materiality, confidence, privilege, or immunity, or any other objection that may be available to it under applicable rules of law or evidence.

This preliminary statement applies to each and every disclosure set forth herein and is incorporated in each disclosure as though fully set forth therein. Without limiting the foregoing, in providing this disclosure, the VBG defendants do not intend to waive, but to the contrary intend to preserve, all applicable privileges, including, but not limited to, the attorney-client and work product privileges. The VBG defendants expressly reserve the right to amend or supplement these disclosures as appropriate under Fed. R. Civ. P. 26(e).

The VBG defendants' initial disclosures are made on the express understanding that by making such disclosures they do not intend to waive, and are not in any way waiving, defenses and/or objections to the Court's jurisdiction over them in this action. The VBG defendants reserve, assert, and intend to assert, all rights to object, pursuant to Fed. R. Civ. P. 12(b)(2), to the Court's exercise of jurisdiction over them.

The VBG defendants' investigation remains ongoing and they further reserve the right to supplement or correct these disclosures as necessary, pursuant to Fed. R. Civ. P. 26(e), based upon further investigation and discovery.

DISCLOSURES**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION**

In response to Rule 26(a)(1)(A), the following individuals may have discoverable information that VBG may use to support its claims and defenses:

Name, Address, Telephone Number	Subject of Information
Joao Vidoca c/o Martin J. Auerbach 1185 Avenue of the Americas 31st Floor New York, NY 10036 Telephone (1) 212 704 4347	Lack of Personal Jurisdiction The operation of the VBG-Vale BSGR Guinea joint venture and its distinction from BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL The distinction between the VBG Guernsey joint venture and BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd.
Telesphore Tchatchou c/o Martin J. Auerbach 1185 Avenue of the Americas 31st Floor New York, NY 10036 Telephone (1) 212 704 4347	Lack of Personal Jurisdiction The operation of the VBG-Vale BSGR Guinea joint venture and its distinction from BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL The distinction between the VBG Guernsey joint venture and BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd.

The following are additional categories of persons who may have discoverable information that the VBG defendants may use to support their claims and defenses:

1. Any person necessary to lay the foundation of any document.
2. Any persons listed in any co-defendant's initial disclosures.
3. Any person listed in Plaintiff's initial disclosures or Plaintiff's responses to any of the VBG defendants' interrogatories.
4. Any supervisor and/or employee of any person listed by any party.

II. DOCUMENTS THE VBG DEFENDANTS MAY USE TO SUPPORT THEIR CLAIMS OR DEFENSES

The VBG defendants incorporate each of the general objections and limitations set forth above in to the following disclosures. Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), and subject to, and without waiver of, the objections and limitations stated above and set forth herein, the VBG defendants describe the following categories of documents, electronically stored information, and/or tangible things (collectively, “Documents”) that are within their possession, custody, or control, and may be used to support their claims or defenses in this action, other than solely for impeachment:

Description by Category

- Documents concerning the VBG defendants’ affirmative defenses, including but not limited to the lack of personal jurisdiction over them.
- Documents concerning the formation and operation of the VBG-Vale BSGR Guinea and its distinction from BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL.
- Documents concerning the distinction between BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd. and the joint venture VBG Guernsey.

Location

The above documents are located at:

VBG – Vale BSGR Guinea
Immeuble bleu, 5ème étage
Moussoudougou-Commune de Matam
BP 6389 Conakry
République de Guinée

VBG Guernsey
Anson Court
La Route des Camps
St Martin
Guernsey GY1 3UQ

The VBG defendants will provide copies of such documents at the time of their production of documents in response to any requests for documents.

In addition to the documents at the foregoing locations, there are additional potentially responsive documents and computers containing potentially responsive documents that were seized by the Judicial Police of the Republic of Guinea, pursuant to a judicially issued Commission Rogatory dated May 2, 2013, and remain in their custody, possession and control. The VBG defendants may or may not have access to these documents in the future.

The VBG defendants reserve the right to supplement their production and to use any documents produced at any time in this action by Plaintiff, any co-defendant, or any third parties.

III. COMPUTATION OF DAMAGES

The VBG defendants have not alleged any counterclaims for damages against Plaintiff at this time and, thus, this provision is inapplicable.

IV. INSURANCE

The VBG defendants do not have any insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment against them, and, thus, this provision is inapplicable.

Dated: New York, New York
July 31, 2014

By: s/ Martin J. Auerbach
Martin J. Auerbach, Esq.

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*Attorney for Defendants BSG Resources (Guinea)
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Guernsey and BSG Resources Guinée SARL aka
BSG Resources (Guinea) SARL aka VBG-Vale
BSGR Guinea*

CERTIFICATE OF SERVICE

I, Erica Appelman, hereby certify that a true and correct copy of Defendants BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd. aka VBG Guernsey and BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL aka VBG-Vale BSGR Guinea's Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) was served upon the following attorneys of record by Electronic Mail on July 31, 2014:

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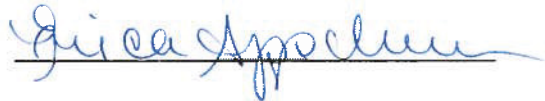
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Erica Appelman

Exhibit E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
RIO TINTO PLC,

Plaintiff,

- v -

VALE, S.A., et al.,

Defendants.
----- X

Case No. 14-cv-3042 (RMB) (AJP)

**DEFENDANT MAHMOUD THIAM'S
RULE 26(a)(1) DISCLOSURES**

Defendant Mahmoud Thiam, by and through his attorneys, Sullivan & Worcester LLP, makes the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) and the Court's scheduling order dated July 10, 2014.

PRELIMINARY STATEMENT

These disclosures are made to the best of Thiam's knowledge at the time of the service of Plaintiff's Complaint. As of this writing, Thiam has yet to file any response to the Complaint. Moreover, as of this writing, the Court has scheduled a pre-motion conference on July 28, 2014 regarding Thiam's anticipated motions to dismiss and to stay discovery. Thiam reserves his right to supplement and amend these disclosures, as appropriate, following the submission of his response to the Complaint and as additional information becomes available.

Additionally, Thiam makes these disclosures without prejudice to his rights to make any objection and/or motion with respect to discovery as permitted by law.

DISCLOSURES**A. PERSONS WITH KNOWLEDGE**

The individuals listed below may have discoverable information that Thiam may use in support of his defenses to the allegations against him in the Complaint, unless the use would be solely for impeachment:

Name	Address	Subjects
Benjamin Steinmetz	c/o Robert Gold, Esq. Mishcon de Reya New York, LLP 750 Seventh Avenue New York, NY 10019	Meetings and communications with Thiam regarding the Simandou concession, including but not limited to the alleged meeting with Thiam referenced in Paragraph 108 of the Complaint.

B. DOCUMENTS

Thiam identifies the following categories of documents in his possession, custody or control that he may use in support of his defenses, unless the use would be solely for impeachment:

1. Correspondence and other documents regarding the Simandou concession.
2. Correspondence and other documents regarding the “apartment in Manhattan” and the “estate in Dutchess County, New York” referenced in Paragraphs 108 and 174(c) of the Complaint.

C. DAMAGES CALCULATIONS

As of this writing, Thiam has not yet determined whether he will seek damages from Plaintiff.

D. INSURANCE

Not applicable.

Dated: New York, New York
July 23, 2014

SULLIVAN & WORCESTER LLP

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